

AYABE CHONG NISHIMOTO
SIA & NAKAMURA

SIDNEY K. AYABE 968-0
RONALD T. MICHIOKA 7790-0
1003 Bishop Street, Pauahi 2500
Honolulu, Hawai'i 96813
Telephone: 537-6119
Facsimile: 526-3491
E-mail: sidney.ayabe@hawadvocate.com
ronald.michioka@hawadvocate.com

Attorneys for the Real Estate Commission
on matters relating to the Real Estate
Recovery Fund

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HARRY SAMELSON and DAN)	CIVIL NO. CV-00-00564 (KSC)
ROKOVITZ,)	(Contract)
)	
Plaintiffs,)	
)	
vs.)	STIPULATION RE: EXAMINATION
)	OF JUDGMENT DEBTOR
KAREN JEFFERY dba PACIFIC)	DEFENDANT KAREN JEFFERY dba
ISLAND INVESTMENTS; DOE)	PACIFIC ISLAND INVESTMENTS
DEFENDANTS 1-20; DOE)	
CORPORATIONS 1-20; DOE)	
PARTNERSHIPS 1-20; DOE)	
GOVERNMENTAL AGENCIES 1-)	
20; DOE AGENCIES 1-20; and)	Examination Date: May 30, 2008
OTHER ENTITIES 1-20,)	Examination Time: 9:30 a.m.
)	
Defendants.)	

[2001631 \ 368688.2]

STIPULATION RE: EXAMINATION OF JUDGMENT DEBTOR
DEFENDANT KAREN JEFFERY dba PACIFIC ISLAND INVESTMENTS

WHEREAS, this Court entered its Order Granting Ex Parte Motion for Order for Examination of Judgment Debtor Defendant Karen Jeffery dba Pacific Island Investments ("Jeffery") ("the Order"), on April 25, 2008, which directed that said examination of judgment debtor ("the Examination") be scheduled in the courtroom of the Honorable Kevin S.C. Chang, Magistrate Judge of the above-entitled Court, in the Prince Jonah Kuhio Kalaniana'ole Federal Building, 300 Ala Moana Boulevard, Honolulu, Hawai'i, at **9:30 a.m. on May 30, 2008;** and

WHEREAS, counsel for Jeffery, Deborah Wright, Esq., has informed the Court and the parties herein that Jeffery will be on a prescheduled personal trip to the State of Oregon prior to the scheduled date for the Examination, will not be returning to the State of Hawai'i until at least the end of the summer of 2008, is willing to produce documents and records enumerated in Exhibit "C" to the Order, and is prepared to appear for the Examination on whatever alternative date, time, and terms as can be mutually agreed upon; and

WHEREAS, counsel for Jeffery has now informed the parties to this Stipulation that Jeffery will not be returning to reside in the State of Hawaii;

WHEREAS, the REC and the Plaintiffs herein, HARRY SAMELSON ("Samelson") and DAN ROKOVITZ ("Rokovitz") (collectively

referred to hereinafter as "Plaintiffs") desire that the Examination be conducted with full and accurate information and disclosure of assets held by or debts owed to Jeffery; and

WHEREAS, the REC and Plaintiffs desire confirmation and full and accurate disclosure of Jeffery's plan for future residency, current residence address, representation by counsel, and availability to appear for the Examination;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by, between and among the undersigned counsel, that Jeffery:

1. Herewith notifies and confirms for this Court and the parties herein, that she is represented for purposes of this Examination, only, by Deborah Wright, Esq., of the law firm Wright & Kirschbraun, with offices at 1885 Main Street, Suite 108, Wailuku, Hawai'i 96793;

2. Hereby requests that all Court records in this matter be updated to reflect her current address which shall be provided to the Court, and to have all further notices from this Court forwarded to said current address, except that all notices, correspondence and exchanges of documentation and information for purposes of this Examination shall be made to Jeffery through her counsel, Deborah Wright, Esq.;

3. Shall provide written confirmation to counsel for REC and Plaintiffs that she does not plan to continue residing in the State of

Hawaii, but currently plans to reside in the State of Oregon which makes her unavailable for the Examination as currently scheduled, and shall provide her address and telephone number in Oregon.

4. Will produce to her counsel, Deborah Wright, all documents and records in her possession that are responsive to the listing in Exhibit "C" to the Order for the Examination, on or before June 15, 2008.

5. Shall respond to written interrogatories submitted by counsel for the REC and the Plaintiffs after the production of documents referenced in the preceding paragraph, within fifteen (15) days of the date on which such interrogatories are served;

6. Shall appear for her oral Examination on the date when the settlement conference in the action, *Karen Jeffery v. Ruby A. Wong, et al.*, Civil Number 07-1-0390, is scheduled by the Second Circuit Court.

IT IS FURTHER STIPULATED AND AGREED, that the Examination shall be conducted in person, by videoconferencing, by telephone, or by any such other means as may be agreed upon by the undersigned counsel.

IT IS FURTHER STIPULATED AND AGREED, that the Examination ordered to be held at 9:30 a.m. on May 30, 2008, be and the same hereby is, continued, subject to the terms, conditions, and agreements as are set forth in this Stipulation.

DATED: Honolulu, Hawai'i, May 14, 2008.

/s/ _____
DEBORAH WRIGHT, ESQ.
Attorney for Defendant and
Judgment Debtor KAREN JEFFERY

/s/ _____
RONALD T. MICHIOKA, ESQ.
Attorney for the Real Estate
Commission on matters relating to
the Real Estate Recovery Fund

/s/ _____
PHILIP BROWN, ESQ.
Attorney for Plaintiffs

APPROVED AND SO ORDERED:

JUDGE OF THE ABOVE ENTITLED COURT

Harry Samelson and Dan Rokovitz v. Karen Jeffery dba Pacific Island Investments, et al.; Civil No. CV-00-00564 (KSC); **STIPULATION** RE: EXAMINATION OF JUDGMENT DEBTOR DEFENDANT KAREN JEFFERY dba PACIFIC ISLAND INVESTMENTS.
